

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE FAB UNIVERSAL CORPORATION)	Lead Case No. 14-CV-687
SHAREHOLDER)	
DERIVATIVE LITIGATION)	
)	
)	
This Document Relates To:)	
)	
ALL DERIVATIVE ACTIONS)	
)	

**NOTICE OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES, REIMBURSEMENT OF EXPENSES, AND INCENTIVE AWARDS**

PLEASE TAKE NOTICE that Plaintiffs Kathi W. Thorbjornsen and Randolph J. Rowekamp respectfully move this Court for an Order pursuant to Rule 23.1 of the Federal Rules of Civil Procedure approving a Fee Award of \$250,000.00 that includes: (1) attorneys' fees in the amount of \$236,167.67; (2) reimbursement of Lead Counsel's expenses in the amount of \$8,832.33; and (3) the payment of service awards to each of the two Plaintiffs in the amount of \$2,500.00.

This motion is based upon the accompanying Memorandum of Law in Support of the Motion for An Award of Attorneys' Fees, Reimbursement of Expenses and Incentive Awards, the Declaration of Melinda A. Nicholson in Support of the Motion for Final Approval of Settlement and Motion for an Award of Attorneys' Fees, Reimbursement of Expenses, and Incentive Awards ("Declaration"), and all related exhibits.

The proposed Order and Final Judgment is attached as Exhibit D to the Stipulation and Agreement of Compromise, Settlement and Release, which is being contemporaneously submitted to the Court as Exhibit A to the Declaration.

Dated: September 3, 2015

Respectfully submitted,

KAHN SWICK & FOTI, LLC

By: s/Melinda A. Nicholson

Melinda A. Nicholson

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Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2015, I electronically filed: Notice of Plaintiffs' Motion for An Award of Attorneys' Fees, Reimbursement of Expenses and Incentive Awards; Memorandum of Law in Support of the Motion for An Award of Attorneys' Fees, Reimbursement of Expenses and Incentive Awards; and the Declaration of Melinda A. Nicholson in Support of the Motion for Final Approval of Settlement and Motion for an Award of Attorneys' Fees, Reimbursement of Expenses, and Incentive Awards using the CM/ECF system, which then sent a notification of such filing (NEF) to all counsel of record.

/s/ Melinda A. Nicholson
Melinda A. Nicholson